

Landers, La Rae CIV (NFEC SW)

From: Collins.Patti@epamail.epa.gov
Sent: Monday, October 24, 2005 12:01 PM
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Subject: Re:EPA Comments on Draft Site 31 RI Report - correction 10/24/2005

Please see correction to General Comment 2. below.

Patti
Collins/R9/USEPA
/US

10/23/05 01:47
PM

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Subject

Re: Comments on Draft Site 31 RI
Report (Document link: Patti
Collins)

Draft Remedial Investigation Report, Site 31, Former South Storage Yard,
NSTI, August 29, 2005

General Comment:

1. Terminology regarding land use is not simply a matter of clarity in a document or set of documents. It sets the framework for the ongoing management of a parcel and planning for changes necessitated by demand as well as proper maintenance of the parcel. For consistency of terminology, please consider the following. The land use designation is the basis for the evaluating exposure to the releases identified in the characterization. There are two situations to consider, the current conditions and future conditions - both under the land use designation. If current conditions pose an unacceptable risk, the need for action to mitigate those risks is immediate. If future conditions (under the land use designation) pose an unacceptable risk, the need for action to

mitigate those risks is no less important, but the need for mitigation isn't immediate. Another way to look at the two parts is in terms of current exposure and future exposure, both under the land use designation.

There may be many configurations or conditions that exist or could develop under the land use designation. Any terminology that states or implies that future conditions are a change in land use as defined by the land use designation will confuse the reader and the record of the evaluation. For the purposes of evaluating risk and the requirements to take action to reduce or eliminate unacceptable risk, there is only one designation of land use, often defined by zoning and a master plan. A change in land use designation triggers many additional steps under a variety of regulations to ensure that new uses of a parcel under a new land use designation are suitable.

2. Generally, it is the preferred practice to take COPCs through the process using ten to the minus six as the point of departure. At the end of the risk assessment, there may be included for review recommendations to drop one or more COPCs that are in the risk range of ten to the minus four to ten to the minus six. That would be a risk management decision. There are many factors that are considered at that point. But importantly, the risk range of ten to the minus four to ten to the minus six is not a technical screening criteria.

Specific Comments:

1. Page ES-2 Future Land Use. This section describes the land use designation using the 1996 plan. Suggest explaining that this is the best available document defining the land use designation, in lieu of zoning and a master plan that would otherwise be used. If the Navy and City (and/or TIDA) have agreed that the 1996 plan serves this purpose, please state this. The title of the section is more clearly "Land Use Designation". And the plan covers the current and future uses under the "Land Use Designation."

2. Page ES-3 Soil Results. The last sentence of the first paragraph describes arsenic and manganese concentrations exceeding residential PRGs, though 'consistent with NAVSTA TI ambient levels.' The first sentence of the next paragraph states that the majority of exceedences were in debris areas, etc. There seems to be a gap in the narrative between the two paragraphs. Was arsenic and manganese eliminated from consideration because it was 'consistent with ambient levels' even though it was found in debris areas, where by definition a release has occurred? Please clarify.

3. Page 6-12, Section 6.2.1 Current Site Conditions. This is confusing. It reads like an introduction in sentences one and two and a conclusion in sentence three. Please clarify.

4. Page 6-30, Section 6.4, Conclusions and Recommendations. For clarity suggest stating explicitly that the risk for the current use is "with or without the paving", if that is the case.

5. Pages 9-6, 9-10 and 9-11 and elsewhere. Subtitles on tables are not consistent. Among the subtitles and terms used, the clearer appear to be "current site conditions" and "future site conditions". If the land use designation is restated, it would be helpful to state that there are a variety of site conditions that would be covered by that designation. Same comment applies to the title of Section 6.2.2 Page 6-15.

6. Tables Page 9-10 and 9-11. Suggest restating the land use designation as part of the heading for the tables. Clarify in the table labeled "current" whether the child exposure inside the schoolyard is dependent on the continued placement and maintenance of the paving. Add, for example, "with or without paving".

7. Page 9-11, Summary and Conclusions. To clearly differentiate the current conditions from the future conditions under the existing land use designation, please state the recommendations in those terms. In other words, for the current conditions, can any portion or all of the paving be removed and pose no unacceptable risk to the current users of the parcel? This is important to state explicitly for the purposes of this document and for the ongoing management of this parcel. Further, although it is assumed in these comments that the authors recognize the following, it is restated for these comments: If the presence of the paving is being relied upon as a barrier to an unacceptable risk to exposure, then that risk must go through the FS/ROD process to determine whether the present barrier is an acceptable remedy, including how it would be maintained in the future.

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